

1 **EDWARD T. SAADI, ESQ.** (Bar No. 186360)  
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8 Attorney for Plaintiff Intuitive Imaging Informatics, LLC

9 **IN THE UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

11 **INTUITIVE IMAGING** ) CASE NO. 2:23-cv-10593-DSF-RAO  
12 **INFORMATICS, LLC**, a Nevada )  
13 limited liability company, ) Hon. DALE S. FISCHER  
14 )  
15 Plaintiff/Counter-Defendant, ) **DECLARATION OF EDWARD T.**  
16 ) **SAADI IN SUPPORT OF MOTION**  
17 v. ) **FOR LEAVE TO FILE FIRST**  
18 ) **AMENDED COMPLAINT**  
19 **INTUITIVE SURGICAL** )  
20 **OPERATIONS, INC.**, a Delaware ) Hearing Date: August 26, 2024  
21 corporation, **INTUITIVE** ) Hearing Time: 1:30 p.m.  
22 **SURGICAL, INC.**, a Delaware ) Courtroom: 7D  
23 corporation, **INTUITIVE SURGICAL** ) Filing Date: December 18, 2023  
24 **HOLDINGS, LLC**, a Delaware limited ) Trial Date: December 9, 2025  
25 liability company, **INTUITIVE** )  
26 **FLUORESCENCE IMAGING, LLC**, )  
27 a Delaware limited liability company, )  
28 **INTUITIVE SURGICAL SERVICE** )  
29 **OPTICS, INC.**, a Massachusetts )  
30 corporation, and **DOES 1-10**, inclusive, )  
31 )  
32 Defendants/Counter-Claimants. )

33 I, EDWARD T. SAADI, the undersigned, declare and say as follows:  
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1           1.     I am an attorney in the law firm of Edward T. Saadi, LLC and counsel  
2 for Plaintiff Intuitive Imaging Informatics, LLC in this action. The facts set forth  
3 in this declaration are within my personal knowledge and, if called to testify, I  
4 could and would testify thereto. I submit this declaration in support of Plaintiff's  
5 **Motion for Leave to File Its First Amended Complaint.** [D.E. #68].  
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7  
8           2.     Attached is a true and correct copy of email correspondence between  
9 Atty. Eleanor Lackman and me on August 1-2, 2024.  
10

11           I DECLARE, under penalty of perjury under the laws the United States, that  
12 the foregoing is true and correct to the best of my knowledge.  
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14           EXECUTED this 11<sup>th</sup> day of August, 2024 at Mackinac Island, Michigan.  
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17 EDWARD T. SAADI  
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